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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

WENDELL BOSTWICK and JOANNA BOSTWICK,

Plaintiffs,

vs.

PM AIR, LLC, dba PROMECH AIR,
PROMECH, INC., and PIRATE
AIRWORKS, INC.,

Defendants

Case No. 1:07-cv-00013-JWS

COMPLAINT FOR PERSONAL INJURIES

WENDELL BOSTWICK and JOANNA BOSTWICK, through counsel, MARK CHOATE of the Choate Law Firm LLC, for their Complaint against PM AIR, LLC dba PROMECH AIR, PROMECH, INC., and PIRATE AIRWORKS, INC., state as follows:

1. WENDELL BOSTWICK and JOANNA BOSTWICK are residents of Clovis, New Mexico.
2. On July 28, 2005 they went on a flightseeing trip in Ketchikan, Alaska in a de Havilland "Otter" DHC-3 floatplane, Registration N6868B. The plane was owned, leased, operated and maintained by defendants, PM AIR, LLC dba PROMECH AIR, PROMECH, INC., and/or PIRATE AIRWORKS, INC., all Alaskan corporations or limited liability companies doing business in Ketchikan, Alaska.
3. The tickets for the flightseeing trip had been purchased earlier onboard the BOSTWICK's cruise ship.

4. On information and belief, the floatplane had just undergone an annual inspection and a 1000 horsepower engine was installed. Those modifications, repairs, maintenance and inspection were done negligently in that an electrical arc on the exterior of a fuel pressure line initiated a fuel leak.
5. During the flightseeing trip on July 28, 2005, a flash fire erupted near the windshield/glare shield area in front of the pilot. The plane filled with smoke and was forced to make an emergency landing.
6. As a direct and proximate result of the defendants' negligence, WENDELL BOSTWICK and JOANNA BOSTWICK suffered personal injuries including pain, emotional distress, physical injury, psychological trauma, past and future medical bills, related treatment costs, other economic damages and lost earning capacity, all in an amount in excess of \$75,000.00, the exact amount to be proven at time of trial.

WHEREFORE, plaintiffs pray for relief against the defendants, as follows:

- A. For trial by jury on all issues so triable;
- B. For their past and future special damages according to proof;
- C. For their past and future general damages according to proof;
- D. For prejudgment interest at the statutory rate, attorney fees and costs;
- E. For such other and further relief as the court deems just and equitable.

Respectfully submitted,
CHOATE LAW FIRM LLC

s/Mark Choate

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